

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company)	
for Authority to Establish a Standard Service Offer)	
Pursuant to §4928.143, Revised Code, in the Form of an)	Case No. 13-2385-EL-SSO
Electric Security Plan.)	

In the Matter of the Application of Ohio Power Company)	
for Approval of Certain Accounting Authority.)	Case No. 13-2386-EL-AAM

MOTION TO INTERVENE OF PAULDING WIND FARM II LLC

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“OAC”) Rule 4901-1-11, and the Attorney Examiner Entry dated January 24, 2014, Paulding Wind Farm II LLC (“Paulding II”) moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant Paulding II leave to intervene because Paulding II has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede Paulding II’s ability to protect that interest.

MEMORANDUM IN SUPPORT

On December 20, 2013, Ohio Power Company (“AEP Ohio”) filed an Application to establish a standard service offer (“SSO”) in the form of an electric security plan (“ESP”). Also on December 20, 2013, AEP Ohio filed an Application for approval of certain accounting authorities. Paulding II has a real and substantial interest in the above-captioned proceedings, will be affected by the Commission’s determination in these matters, and should be permitted to intervene.

Paulding II is a Delaware limited liability company and a subsidiary of EDP Renewables North America LLC (formerly Horizon Wind Energy LLC) which develops, constructs, owns, and

operates wind farms throughout North America. Further, Paulding II is a supplier of renewable energy resources to AEP Ohio, in which Paulding II's costs are recovered through AEP Ohio's Rider AER. Paulding II is seeking intervention in this case to support its interest in ensuring the operation of Rider AER, as proposed by AEP Ohio in its filing.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, Paulding II is a real party in interest in this proceeding. Paulding II submits that its interest is not represented by existing parties and thus its interests are not now represented. Paulding II's participation will not unduly delay this proceeding or prejudice any existing party. By granting Paulding II's motion to intervene, the Commission will permit Paulding II to contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings.

Accordingly, Paulding II respectfully requests the Commission to determine that Paulding II has a real and substantial interest in these proceedings and should grant its motion to intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
PAULDING WIND FARM II LLC



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 7th day of March 2014 *via* electronic mail.



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Summary: Motion of Paulding Wind Farm II LLC to Intervene electronically filed by Teresa Orahoad on behalf of J. Thomas Siwo